

## **Remarks**

### **Claim Rejections**

Claims 1, 14, and 25-26 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent 5,998,738 to Li (hereinafter "Li") in view of U.S. Patent Application 2003/0049972 to Aoki (hereinafter "Aoki").

First, the Official Action states that "It would have been obvious to one of ordinary skill in the art at the time the invention was made to use the electrical terminal pin design of Aoki for the pins of Lin et al. for the purpose of providing to secure the connector header within the casing." The Official Action cites Aoki, paragraph 0057, lines 5-11 as support for this statement. The cited passage is silent as to any desire to provide a secure connection for the header. With this being the only stated reason for the combination, the Official Action has failed to provide a prima facie case of obviousness. Furthermore, the proposed combination is a product of hindsight. Aoki only discloses direct abutment of a connector and a circuit board. Aoki fails to discuss securing a housing therebetween via the mechanical connection of the connector and the circuit board. Furthermore, Li teaches connection of the connector 36 to base plate 12 without utilizing a mechanical connection between connector contact pins 38 and film 18. Accordingly, any such mechanical connection would be redundant.

Additionally, the proposed combination would not have a reasonable expectation of success. Substrate 18 of Li is a film. Press fit parts 9 of terminals 5 of Aoki rely on sufficient surface area to allow a friction fit between terminals 5 and substrate 11. First, film 18 of Li is too thin to allow such a friction fit. Second, film 18 is not rigid enough to prevent deformation and thus would allow terminals 5 to be removed. Accordingly, one of ordinary skill in the art would not supply terminals 5 of Aoki to the film substrate 18 of Li in order to "secure the connector header within the casing." Accordingly, the proposed combination would not be obvious to one of ordinary skill in the art in that it does not have a reasonable expectation of success. Applicant respectfully requests removal of the rejection of claim 1. Applicant further believes that claim 1 is in condition for allowance. Such allowance is respectfully requested.

Claim 14 was rejected by the Official Action by stating, "the recited method steps would necessarily be performed in the assembly of the above-mentioned system as claim 1." Applicant notes that claim 14 requires "providing a sealing member between said casing and said header which is compressed in the mating direction." Claim 1 fails to discuss such a sealing

member. Accordingly, a citation to the rejection of claim 1 is insufficient to further reject claim 14. Applicant respectfully requests removal of the rejection of claim 14. Applicant further believes that claim 14 is in condition for allowance. Such allowance is respectfully requested.

Claims 2-13 and 15-24 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lin, as modified, as applied to claim 1 above (combined with Aoki) and further in view of U.S. Patent No. 6,652,292 to Pratt (hereinafter "Pratt"). Each of claims 2-13 and 15-24 depend from either claim 1 or claim 14. In that claims 1 and 14 are believed to be in condition for allowance, claims 2-13 and 15-24 are also believed to be allowable. Such allowance is respectfully requested.

Additionally, claim 8 depends from claims 1 and 7 and requires "a seal member positioned within said sealing groove and in sealing contact with said sealing wall." In rejecting claim 7, the Official Action stated "Pratt et al disclose the casing having a sealing groove (22,...) including a seal member (36,...) with a complementary geometry as the upstanding seal wall and being received therein." Assuming that the reversal of parts discussed in the rejection of claim 7, flange 36 is cited as the sealing wall in that it is received in groove 22. Claim 8 requires the seal member to be in contact with the sealing wall. Therefore, flange 36 cannot be both the sealing wall and the seal member as cited by the Official Action. Accordingly, claim 8 is believed to be in condition for allowance.

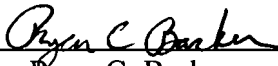
Claim 9 depends from claim 1 and requires "said connector header has a mounting surface which extends at least partially into said opening." The Official Action states that "Pratt et al. disclose the connector header having a mounting surface (38, ...) which extends at least partially into the opening." The rejection further states "it would have been obvious to one of ordinary skill in the art ... to use the flange design of the connector header of Pratt et al., in Lin et al., as modified, for the purpose of providing an abutment of the mounting surface of the connector header relative to the opening of the casing." This supposed motivation is a reflexive statement that provides no motivation. In other words, the supposed motivation says "it would have been obvious to do 'X' so that you can achieve 'X.'" The stated motivation fails to state why one would be led to do X or want to achieve X. The stated motivation fails to discuss why one would be led to "[provide] an abutment of the mounting surface of the connector header relative to the opening of the casing." Accordingly, the Official Action fails to provide a prima facie case of obviousness. Accordingly, claim 9 is in condition for allowance.

Claim 11 requires "wherein said header mounting surface is adhesively fixed to said casing." The Official Action states that "Lin et al., as modified, disclose wherein the header mounting surface is adhesively fixed to the substrate(31...)." "31" of Lin is not a substrate, but rather an adhesive. Furthermore adhesive 31 couples film 18 and casing section 15. Adhesive 31 does not couple a header mounting surface to the casing. Accordingly, the rejection of claim 11 is improper. Removal of the rejection is respectfully requested.

If necessary, Applicants request that this response be considered a request for an extension of time appropriate for the response to be timely filed. Applicants request that any required fees needed beyond those submitted with this response be charged to the account of Baker & Daniels, Deposit Account No. 02-0390.

The Examiner is invited to contact the undersigned at the telephone number provided below should any question or comment arise during consideration of this matter.

Respectfully submitted,

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